

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,

Plaintiff,

v.

Traders Global Group Inc., a New Jersey
corporation, d/b/a “My Forex Funds”;
Traders Global Group Inc., a Canadian
business organization; and Murtuza Kazmi,

Defendants.

Case No.: 3:23-cv-11808

**STIPULATION EXTENDING DEFENDANTS’ TIME TO ANSWER, MOVE OR
OTHERWISE RESPOND TO THE COMPLAINT**

WHEREAS, Defendants were served with the Summons (ECF Nos. 19, 20, 21) and Complaint (ECF No. 1) in this action on August 31, 2023; and

WHEREAS, the initial deadline for Defendants to respond to the Complaint was September 21, 2023. Fed. R. Civ. P. 12(a)(1)(A)(i); and

WHEREAS, the Court has granted one previous joint request to extend Defendants’ deadline to respond to the Complaint per Rule 12. (ECF No. 57); and

WHEREAS, the current deadline for Defendants to respond to the Complaint is October 23, 2023. (ECF No. 57); and

WHEREAS, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), the Court has authority, “for good cause,” to extend the time if a request is made before the original time or its extension deadline expires. Fed. R. Civ. P. 6(b)(1)(A); D. N.J. Civ. R. 6.1.

WHEREAS, good cause exists to extend the expiration of the time to file a responsive pleading or a Rule 12 motion by 30 days to allow counsel to prepare a response in opposition to Plaintiff’s motion for preliminary injunction and to prepare for the preliminary injunction hearing scheduled for November 6, 2023. (ECF No. 88). The requested extension would make Defendants’ new deadline to respond to the Complaint November 22, 2023.

Accordingly, it is hereby stipulated by the parties through their undersigned counsel that a request is hereby made to the Court that:

1. Defendants’ time to answer, move or otherwise respond to the Complaint is hereby adjourned for 30 days from October 23, 2023 to and including November 22, 2023; and
2. This stipulation may be signed in counterparts; and facsimile, photocopy, or electronic pdfs of the signatures below are hereby deemed the equivalent of originals.

Pursuant to Local Civil Rule 12(c), the submitting attorney certifies that each of the signatories below has expressly agreed to the form and substance of this document and has authorized the filing attorney to submit the document electronically.

October 12, 2023

Respectfully Submitted,

/s/ Anthony J. Staltari
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Counsel for Defendants

October 12, 2023

Agreed and Stipulated to By:

/s/ Ashley J. Burden

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